

Joint Status Report Pursuant to Rule 26(f)

Caption: Ramona Henry v Manufacturers and Civil Action No: 2:21-cv-03267
Traders Trust Company d/b/a M&T

Bank

Basis of Jurisdiction: Federal Question: Employment Discrimination

Jury Trial: X Non-Jury Trial: Arbitration:

Plaintiff's counsel participating in the Rule 16 Conference: Robert H. Graff, Esq.

Defendants counsel participating in the Rule 16 Conference: Renee C. Mattei Myers, Esq.

Do counsel have full authority to settle at Rule 16 Conference? Yes

If not, client with such authority who will attend conference:

When did the parties hold the Rule 26 Conference? 10/5/21

Pl: 10/4/21

When did the parties comply with the Rule 26(a)'s duty of self-executing disclosure?

Df: 9/30/21

Does either side expect to file a case-dispositive motion? Yes (yes/no)

If yes, under what Rule 56

If yes, specify the issue no disputed issue of material fact

Proposed deadline for filing dispositive motions: 3/4/22

Does either side anticipate the use of experts? TBD

If yes, what is the proposed deadline for expert discovery?

Approximate date case should be trial-ready: 5/3/22

Time for Plaintiff's case: 2 days Time for Defendant's case: 2 days

Is a settlement conference likely to be helpful? Yes If so, when:

Early No (yes/no) After Discovery Yes (yes/no)

Do the parties wish to proceed before a Magistrate Judge for final disposition? No

Plan for Discovery:

1. The parties anticipate that discovery should be completed within 120 days.
2. What is the minimum amount of time necessary to complete discovery prior to an ADR session, should one be ordered or agreed to? 60 days
3. Have the parties discussed issues relating to claims of privilege or of protection as trial-preparation material, as required by Rule 26(f)(3)(D)? Yes
4. Identify any other discovery issues which should be addressed at the Rule 16 Conference, including limitations on discovery, protective Orders needed, or other elements which should be included in a particularized discovery plan.
5. If you contend the discovery period to exceed 90 days, please state reason:
Intervening holidays, third-party witnesses, settlement conference
6. Do the parties anticipate the need to subpoena any third parties? Yes

If yes, to the extent any authorizations or releases are required to be signed, counsel should exchange them in advance of the Rule 16 Conference.